

Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan Governor

Lori F. Kaplan Commissioner

November 6, 2003

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: Conn-Selmer, Inc., Vincent Bach Division / SPM 039-17973-00010

FROM: Paul Dubenetzky

Chief, Permits Branch Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, within eighteen (18) calendar days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply

- the date the document is delivered to the Office of Environmental Adjudication (OEA); (1)
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail: or
- The date on which the document is deposited with a private carrier, as shown by receipt issued by (3)the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- the name and address of the person making the request: (1)
- (2) the interest of the person making the request;
- (3)identification of any persons represented by the person making the request;
- the reasons, with particularity, for the request: (4)
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, (6)would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

> **Enclosures** FNPER-MOD.dot 9/16/03



November 6, 2003

Mr. Don Schnell Conn-Selmer, Inc., Vincent Bach Division 500 Industrial Parkway Elkhart, Indiana 46516

Re: 039-17973

Second Significant Permit Modification to

Part 70 No.: T 039-7813-00010

Dear Mr. Schnell:

Conn-Selmer, Inc., Vincent Bach Division was issued a Part 70 permit on January 4, 2001 for operation of a stationary musical instrument manufacturing plant. A letter requesting changes to this permit was received on July 22, 2003. This modification allows the source to revert back to the use of compliant coatings and solvent based coatings (non-compliant) originally permitted in Part 70 permit T039-7813-00010, which involve significant changes in the terms or conditions, as new conditions are added in the Part 70 permit. Pursuant to the provisions of 326 IAC 2-7-12(d)(1), Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments APD

cc: File - Elkhart County

U.S. EPA, Region V

Elkhart County Health Department

Northern Regional Office

Air Compliance Section Inspector -Paul Karkiewicz

Compliance Data Section - Karen Nowak

Administrative and Development

Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Conn-Selmer Inc., Vincent Bach Division 500 Industrial Parkway Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7813-00010						
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:					
First Significant Permit Modification 039-14696, issued on November 12, 2001						
Second Significant Permit Modification 039-17973	Pages Affected: 5, 6, 28, 29, 30, 35, 36, 37, 38, 39, 40, 41, 42, 53					
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issued: November 6, 2003					

2nd Significant Permit Modification 039-17973 Modified by: Aida De Guzman Page 5 of 54 T 039-7813-00010

Conn-Selmer, Inc., Vincent Bach Division Elkhart. Indiana

Permit Reviewer: CAO/MES

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary musical instrument manufacturing source.

Responsible Official: Don J. Schnell

Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516

Phone Number: 219-295-6730

SIC Code: 3931 County Location: Elkhart

Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) surface coating booth, identified as EU-03A, for coating brass musical instruments, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stack S3A, capacity: 100 instruments per hour.
- (b) One (1) buffing department, with a total capacity of 100 instruments per hour, consisting of six (6) buffing lines including:
 - (1) Department 1051 (Main Buffing) mush buff, identified as EU-01E, constructed in 1988, controlled by baghouse 11A and exhausting through stack S11A;
 - (2) Department 1051 (Main Buffing) EU-01F, constructed in 1997, controlled by baghouse 9A and exhausting through stack S9A;
 - (3) Department 1051 (Main Buffing) EU-01G, constructed in 1997, controlled by baghouse 9B and exhausting through stack S9B;
 - (4) Department 1051 (Main Buffing) EU-01H, constructed in 1997, controlled by baghouse 9C and exhausting through stack 9C;
 - (5) Department 1051 (North Buffing Room), one (1) buffing room, EU-01I, constructed in 1988, controlled by a cyclone and two (2) baghouses 10A and 10B and exhausting through stacks S10A and S10B; and
 - (6) EU-01J (Department 1059 mouthpiece/ Department 1044 small parts buffing), constructed in 1988, controlled by baghouse 10C and exhausting through stack S10C.

- (c) One (1) polishing department, constructed in 1997, with a total capacity of 100 instruments per hour, consisting of three (3) polishing lines and one (1) mush buff line as follows:
 - (1) Department 1041 (Brass Parts Buffing), one (1) mush buff line, identified as EU-01A, and one (1) polish line, identified as EU-01B, controlled by baghouse 11B and exhausting through stack S11B; and
 - (2) Department 1041 (Brass Parts Buffing), two (2) polish lines, identified as EU-01C and EU-01D, controlled by baghouses 11C and 11D and exhausting through stacks S11C and S11D, respectively.
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) natural gas-fired boiler, capacity: 6.28 million British thermal units per hour. [326 IAC 6-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Activities or categories of activities with individual HAP emissions not previously identified.
 - Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day of one (1) ton per year of a single HAP.
 - Brief description: Brazing with alloys containing HAPs (Cadmium). [326 IAC 6-3-2]
- (f) Activities or categories of activities with a combination of HAP emissions not previously identified.
 - Any unit emitting greater than one (1) pound per day but less than twelve and one half (12.5) pounds per day of two and one half (2.5) ton per year of any combination of HAPs.

2nd Significant Permit Modification 039-17973 Modified by: Aida De Guzman Page 6 of 54 T 039-7813-00010 Conn-Selmer, Inc., Vincent Bach Division Elkhart, Indiana

Permit Reviewer: CAO/MES

SECTION D.1 FACILITY OPERATION CONDITIONS

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Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) surface coating booth, identified as EU-03A, for coating brass musical instruments, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stack S3A, total capacity: 100 instruments per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

The input VOC from the combined usage of the solvent based coatings and compliant coatings, including dilution and cleaning solvents at booth EU-03A shall be limited to less than fifteen (15) pounds per day. Compliance with this limit shall make 326 IAC 8-2-9 not applicable to this facility.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from booth EU-03A shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D.1.1(b) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage at booth EU-03A for that day.

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when booth EU-03A is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (S3A) while booth EU-03A is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limit established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day at EU-03A;

Conn-Selmer, Inc., Vincent Bach Division Elkhart, Indiana

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(4) The total VOC usage for each day at EU-03A;

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- (b) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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Permit Reviewer: CAO/MES

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR MANAGEMENT** AIR COMPLIANCE BRANCH

Part 70 Quarterly Report

Month: _____ Year: _____

Source Name: Conn-Selmer, Inc. Vincent Bach Division Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516 Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516

Part 70 Permit No.: T 039-7813-00010

Facility: One (1) surface coating booth (EU-03A)

14

15

Parameter: VOC usage

Limit: Less than fifteen (15) pounds per day

Day	VOC Usage (lb/day)	Day	VOC Usage (lb/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	

30

31

Conn-Selmer, Inc., Vincent Bach Division Elkhart, Indiana

16

2nd Significant Permit Modification 039-17973 Modified by: Aida De Guzman

no. of

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Permit Reviewer: CAO/MES

	deviations	
?	No deviation occurred in this month. Deviation/s occurred in this month. Deviation has been reported on:	
Submit Title/Po Signatu Date:	osition:ure:	

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Significant Permit Modification

Source Name: Conn-Selmer Inc, Vincent Bach Division
Source Location: 500 Industrial Parkway, Elkhart, Indiana 46516

County: Elkhart SIC Code: 3931

2nd Significant Permit Modification:039-17973-00010Operation Permit No.:T039-7813-00010Permit Reviewer:Aida De Guzman

On October 27, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Conn-Selmer Inc, Vincent Bach Division had applied for a Part 70 Significant Permit Modification to use a combination of compliant coatings and non-compliant solvent based coatings to be used for the manufacture of musical instruments, originally permitted in Part 70 permit T039-7813-00010. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 27, 2003, Keramida Environmental, Inc., the source's consultant has submitted the following comments to the draft Significant Permit Modification 039-17973-00010:

Comment 1:

The source believes that the base permit that the IDEM used for this modification was not the latest permit version. We believe that the First Significant Permit Modification (039-14696) issued on November 12, 2001 is the latest permit and should have been used as the base for this modification. In an effort to preserve any permit language that was negotiated during the last modification, we respectfully request that IDEM use the November 12, 2001 permit as a base for the modification application.

Response 1:

A re-review was done to compare the draft permit and the First Significant Permit Modification 039-14696 issued on November 12, 2001. It confirms that the draft was based on the First Significant Permit Modification. Some of the conditions, however, that were in the First Significant Permit Modification were deleted as explained in the TSD of the draft Significant Permit Modification 039-17973, as they no longer applicable.

The Section D.1 table will be modified to delete the reference to "EU-03B" and "stack S3B", as they were inadvertently left out in the draft permit.

2nd Significant Permit Modification 039-17973 Modified by: Aida De Guzman Page 2 of 2 T 039-7813-00010

Facility Description [326 IAC 2-7-5(15)]:

(a) Two (2) One (1) surface coating booths, identified as EU-03A and EU-03B, for coating brass musical instruments, constructed prior to 1970, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stacks S3A and S3B, total capacity: 100 instruments per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification

Source Background and Description

Source Name: Conn-Selmer Inc., Vincent Bach Division
Source Location: 500 Industrial Parkway, Elkhart, Indiana 46516

County: Elkhart SIC Code: 3931

Operation Permit No.: T039-7813-00010
Operation Permit Issuance Date: January 4, 2001

Permit Modification No.: 039-17973

Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Conn-Selmer Inc., Vincent Bach Division, a musical instrument Manufacturing source, relating to the following requested changes (additions are **bolded** and deletions are **struck-through**-for emphasis):

Request 1:

Conn-Selmer is requesting to revert back to the use of solvent based coatings permitted in the original Part 70 permit T039-7813-00010, issued on January 4, 2001. Significant Permit Modification 039-14696, issued in November 12, 2001 allowed Conn-Selmer to use different types of coatings that were all compliant to 326 IAC 8-2-9, however, these coatings resulted in significant quality problems with some of the products.

Response 1:

Conn-Selmer will be allowed to revert back to the use of compliant coatings and solvent based coatings originally permitted in Part 70 permit T039-7813-00010, however, restrictions will apply as re-instated in the following conditions:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of clear coating applied to musical instruments at booth EU-03A shall be limited to 4.3 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The input VOC from the combined usage of the solvent based coatings and compliant coatings, including dilution and cleaning solvents at booth EU-03A shall be limited to less than fifteen (15) pounds per day. Compliance with this limit shall make 326 IAC 8-2-9 not applicable to this facility.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour; and $P =$ process weight rate in tons per hour

Condition D.1.5 will be added back in the permit. Subsequent conditions will be renumbered accordingly.

D.1.5 VOC Emissions

Compliance with Condition D.1.1(b) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage at booth EU-03A for that day.

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation place at all times when the two (2) surface coating booths, identified as EU-03A and EU-03B booth EU-03A are is in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S3A and S3B) while one (1) or more of the booths are booth EU-03A is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.78 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2 4) below. Records maintained for (1) through (2 4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day at EU-03A;

(4) The total VOC usage for each day at EU-03A;

- (b) no change
- (c) no change

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The following reporting will be added in the permit:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

AIR COMPLIANCE BRANCH

Part 70 Quarterly Report

Source Name: Conn-Selmer Inc., Vincent Bach Division
Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516

Part 70 Permit No.: T 039-7813-00010

Facility: One (1) surface coating booth (EU-03A)

Parameter: VOC usage

Limit: Less than fifteen (15) pounds per day

Month:	 Year:	

Day	VOC Usage (lb/day)	Day	VOC Usage (lb/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

? N	o c	leviati	on o	occur	red	in	this	month	n

?	Deviation/s occurred in this month.	
	Deviation has been reported on:	

Submitted by: Title/Position:

Signature:
Date:
Phone:

Attach a signed certification to complete this report.

- Request 2: In addition to the request modification the source is requesting that all references to the one (1) open top vapor degreaser, identified as EU-02A be deleted as this unit has been removed from the plant.
- Response 2: Section A.2(d) will be modified to delete EU-02A degreaser as follows:
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) through (c) no changes
- (d) One (1) open top vapor degreaser, identified as EU-02A, using trichloroethylene, constructed in 1999, replacing an existing defective decrease which was constructed in 1959, capacity: 11 instruments or equivalent parts per hour.

Section D.3. for the open top vapor decrease will also be deleted as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) One (1) open top vapor decrease, identified as EU-02A, using trichloroethylene, constructed in 1999, replacing an existing defective decrease which was constructed in 1959, capacity: 11 instruments or equivalent parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

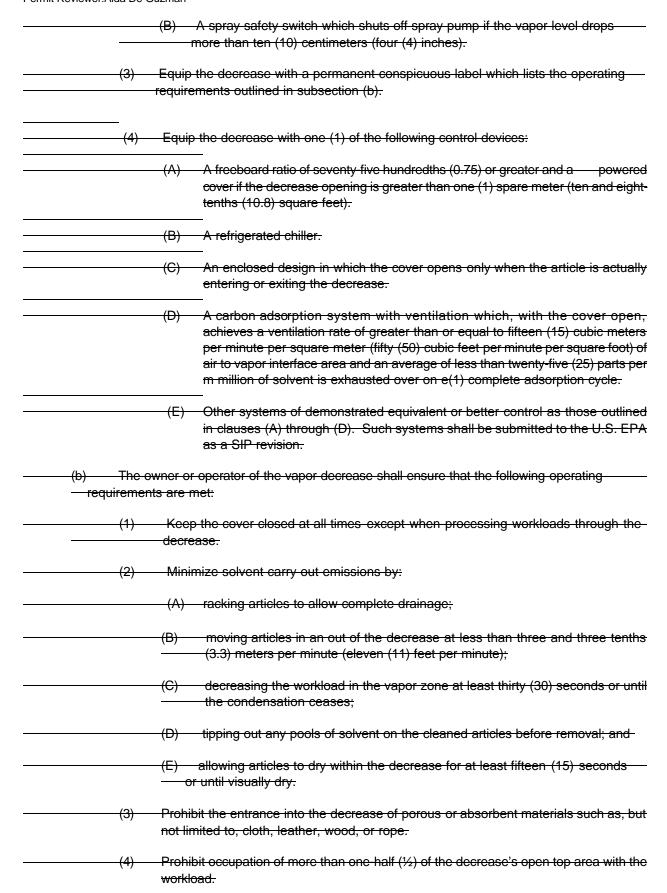
Emission Limitations and Standards [326 IAC 2-7-5(1)]

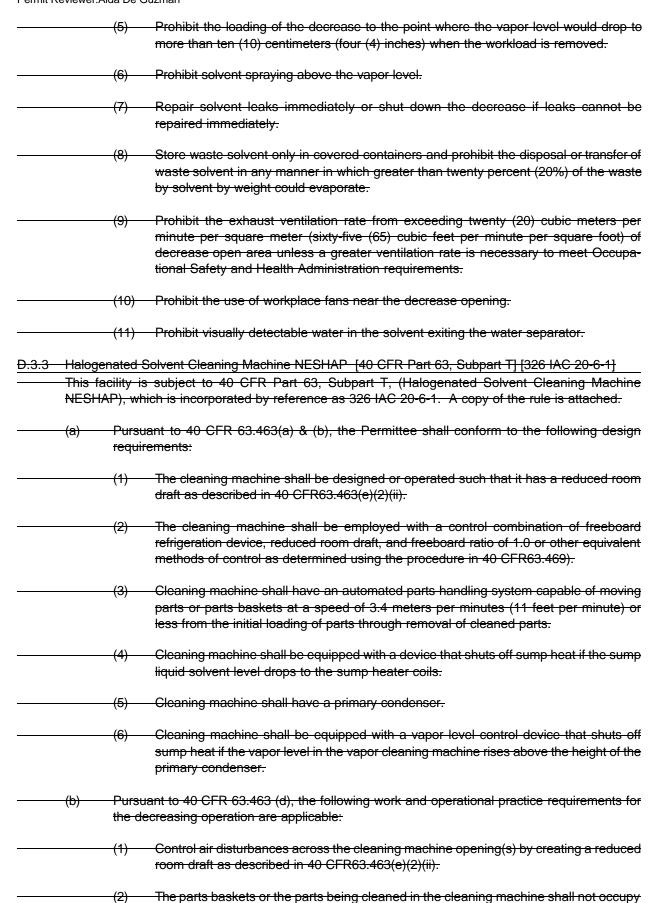
D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

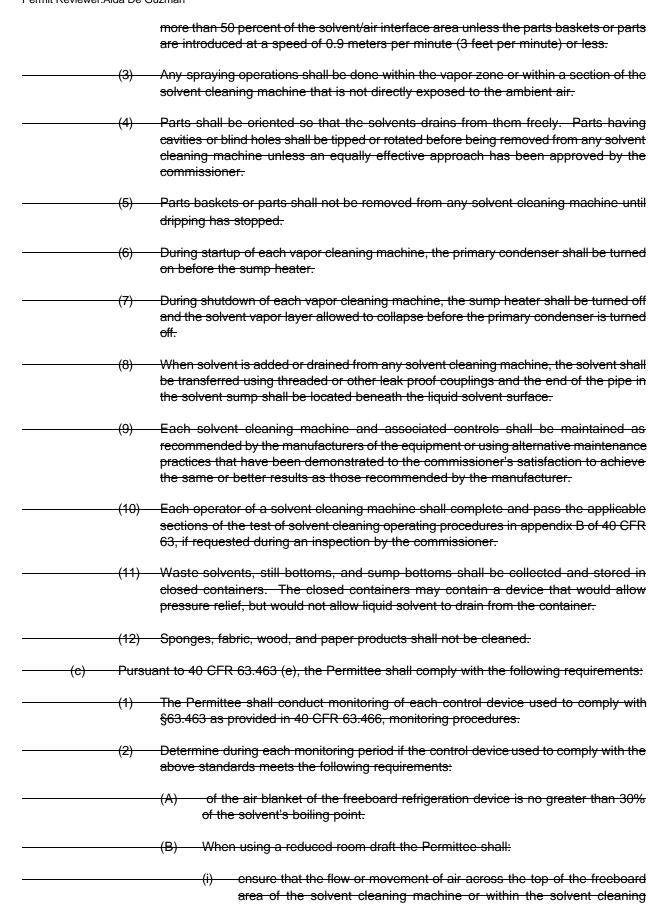
The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

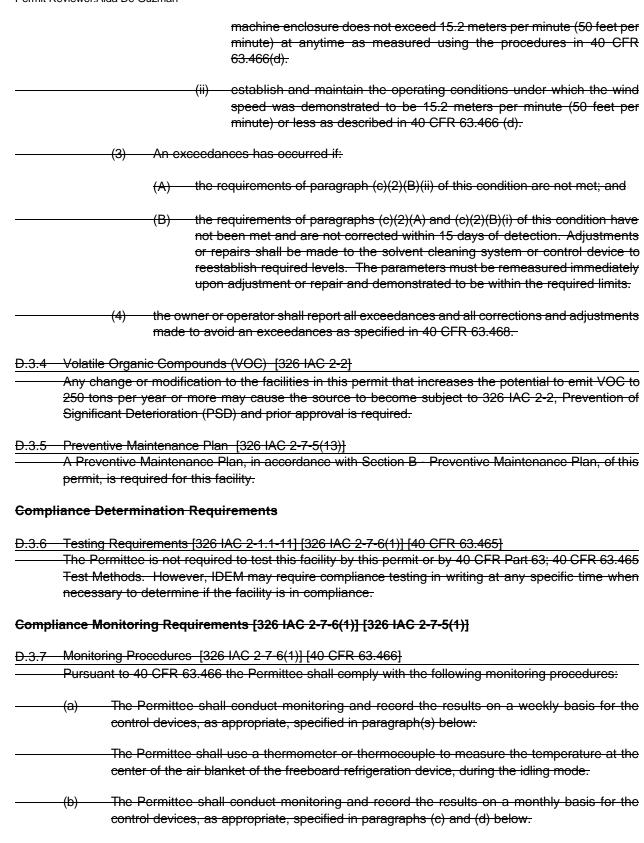
		<u> </u>	00111000111111	()	[0=0 :: 10	
D.J.Z	voiauic	Oluanic	Compounds	10001	IJZU IAC	, 0-0-0 1

- (a) Pursuant to 326 IAC 8-3-6 (Organic solvent decreasing operations: open top vapor decrease operation and control requirements), the owner or operator of the one (1) vapor decrease shall ensure that the following control equipment requirements are met:
- (1) Equip the decrease with cover that can be opened and closed easily without disturbing the vapor zone.
 - (2) Equip the decrease with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes to warm.







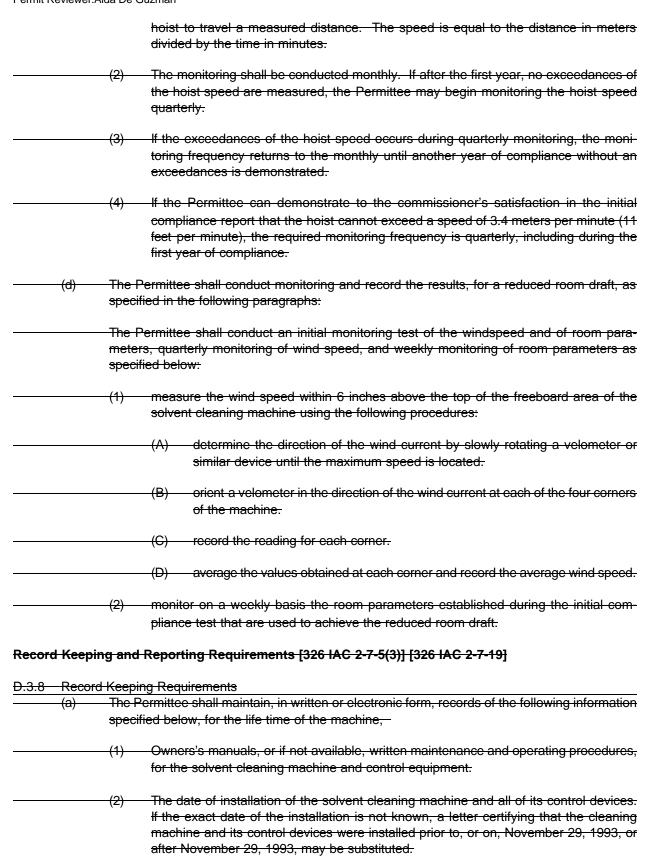


The Permittee shall monitor the hoist speed as described below:

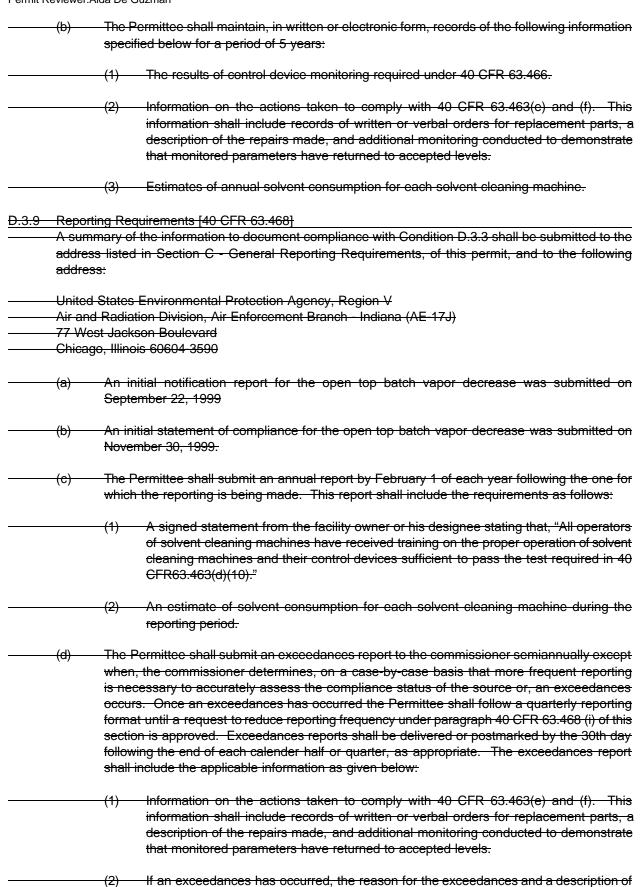
The Permittee shall determine the hoist speed by measuring the time it takes for the

(3)

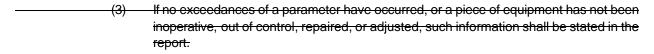
cleaning machine.



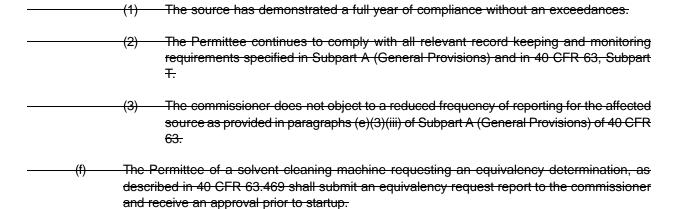
Records of the halogenated HAP solvent content for each solvent used in a solvent



the actions taken.



(e) Pursuant to 40 CFR 63.463 (i), the Permittee who is required to submit an exceedances report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:



Justification of the Modification

- (a) The above changes involve significant changes in the terms or conditions, as new conditions are added in the Part 70 permit. Therefore, the Part 70 permit is modified through Significant Permit Modification, pursuant to 326 IAC 2-7-12(d)(1).
- (b) The above changes do not constitute a source modification, as no new emission unit is being installed, or the changes do not constitute any physical change or change in the method of operation that increases the PTE or results in emission of pollutant not previously emitted.

Conclusion

The coating changes shall be subject to the conditions of the attached **Significant Permit Modification 039-17973-00010.**